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Attorneys for Defendant
ViSalus, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LORI WAKEFIELD, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

VISALUS, INC., a Nevada corporation,

Defendant.

No. CV No. 3:15-cv-01857-SI

**UNOPPOSED MOTION
FOR AN EXTENSION OF TIME TO
NOVEMBER 12 TO FILE REPLIES FOR
THE THREE PENDING POST-
JUDGMENT MOTIONS:
(1) DEFENDANT'S REPLY SUPPORTING
NEW TRIAL/JMOL MOTION; (2)
PLAINTIFF'S REPLY SUPPORTING
CLASS NOTICE PROPOSAL; AND (2)
PLAINTIFF'S REPLY SUPPORTING
ATTORNEYS' FEES & INCENTIVE
AWARD**

LOCAL RULE 7-1 CERTIFICATION

Counsel for Defendant ViSalus and Counsel for Plaintiff Wakefield have conferred and agree to the extensions requested here.

UNOPPOSED MOTION FOR EXTENSIONS OF TIME

Currently pending is ViSalus's renewed motion for judgment as a matter of law and new trial (Dkt. 395), for which the reply is currently due October 29, 2020. On October 26, ViSalus requested that Plaintiff agree to an extension to November 12, 2020, and Plaintiff's counsel so agreed.

Also currently pending are Plaintiff's motion for attorneys' fees and an incentive award (Dkt. 388) and Plaintiff's motion for approval of post-judgment notice plan and claims procedure (Dkt. 396). Plaintiff's replies supporting these motions are currently due November 5, 2020. On October 26, Plaintiff requested that this be extended to November 12, to which ViSalus's counsel agreed.

Good cause exists for these extensions to allow the parties to address the numerous issues raised in these motions. These extensions will not impact other existing deadlines and are not sought for purposes of delay.

Dated: October 26, 2020

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

By s/Benjamin G. Shatz

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